

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL  
ENTERTAINMENT INC, *et al.*,<sup>1</sup>

Debtors.

Chapter 7

Case No. 24-11442 (MFW)  
(Jointly Administered)

**Related Doc. No. 509**

**CHAPTER 7 TRUSTEE’S LIMITED OBJECTION TO THE  
MOTION OF BLAKE RIDDER LIMITED FOR ENTRY OF AN ORDER  
COMPELLING TRUSTEE TO REJECT MOTION PICTURE DISTRIBUTION  
AGREEMENT AND GRANTING RELATED RELIEF**

George L. Miller in his capacity as Chapter 7 Trustee (the “Trustee”) for the Estates of the above-captioned Debtors (the “Debtors”), by and through his undersigned counsel, files this limited objection (the “Limited Objection”) to the *Motion of Blake Ridder Limited for Entry of an Order Compelling Trustee to Reject Motion Picture Distribution Agreement and Granting Related Relief* [D.I. 509] (the “Motion”) as follows:

1. The Trustee objects to the Motion by Blake Ridder Limited (the “Movant”) and the proposed order for relief submitted by the Movant, a copy of which is attached hereto as Exhibit “A” (the “Movant’s Proposed Order”) to the extent the Movant’s Proposed Order seeks to create obligations to abandon and return a subject Film and unidentified personal property allegedly belonging to Movant which obligations do not exist under applicable the Distribution Agreement.<sup>2</sup>

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment, Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508). The Debtors’ corporate headquarters and service address is 132 East Putnam Avenue, Floor 2W, Cos Cob, CT 06807.

<sup>2</sup> Capitalized terms unless expressly defined herein shall have the meanings ascribed to them in the Motion.

Furthermore, the Trustee objects to the Movant's request for entry of an Order compelling the Trustee to reject the Distribution Agreement because the Distribution Agreement had already been deemed rejected by operation of law pursuant to 11 U.S.C. § 365(d)(1) prior to the filing of the Motion.

2. The Distribution Agreement provides in section 11.2 that the Movant as Licensor agrees in the event of any breach by the Debtor as Distributor that the Movant's rights and remedies are limited to the right, if any, to recover money damages in an action at law and in no event will the Movant as Licensor be entitled by reason of such breach to seek injunctive or other equitable relief as to enjoin or restrain the distribution, exhibition, advertising or any other means of exploitation of the Picture (Film), or, the Licensed Rights. Accordingly, the Movant has agreed to limit its rights to monetary damages for breach of the Distribution Agreement and is not entitled to equitable relief to compel the Trustee to take any action to abandon and return the Film and any related personal property allegedly belonging to the Movant. Therefore, the Trustee objects to the grant of any such additional relief sought to compel the Trustee to abandon and return the Film and any alleged related personal property belonging to the Movant.

3. The Trustee does not object to the entry of a revised Proposed Order in the form attached hereto as Exhibit "B" (the "Trustee's Revised Proposed Order") which is limited to providing that the Distribution Agreement has been deemed rejected by operation of law pursuant to 11 U.S.C. § 365(d)(1).

WHEREFORE, the Trustee respectfully requests based upon the foregoing Limited Objection that the Movant's Proposed Order not be entered, but rather the Trustee's Revised Proposed Order be entered.

Dated: December 23, 2024  
Wilmington, Delaware

COZEN O'CONNOR

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